

In the Matter of)
) Western Territory
RADIOLOGICAL EMERGENCY) Regions 8, 9 and 10
PREPAREDNESS PROGRAM)
STRATEGIC REVIEW)
)
At-Large Stakeholders Meeting)
)

Date: December 2, 1997

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UNITED STATES FEDERAL EMERGENCY MANAGEMENT AGENCY

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AUDITORIUM
SAN FRANCISCO, CALIFORNIA

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9:30 a.m.

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Reported by:

George Palmer

APPEARANCES

Ray Williams, Acting Regional Director, Region 9; Deputy Regional Director, Region 10

Rick Auman, Facilitator, Human Technologies

Anne Martin, Deputy Director FEMA Headquarters Exercise Division; Chairperson, Strategic Review Steering Committee

Sharon Stoffel, Region 1, Boston

Mary Lynn Miller, Region 4, Atlanta

Stanley MacIntosh, Region 2, New York

Falk Kantor, Member, Strategic Review Steering Committee, Nuclear Regulatory Commission

Tom Essig, Nuclear Regulatory Commission

Bill McNutt, FEMA

Marcus Wynche

Bob Bissell, RAC Chairperson, Region 7, Kansas City

Janet Lamb, RAC Chairperson, FEMA Region 3, Philadelphia

Woody Curtis, RAC Chairperson, Region 5, Chicago

Steve Borth, FEMA, EMI

Tammy Doherty, FEMA, Region 9, Seattle

Rose Mary Hogan, Nuclear Regulatory Commission Headquarters

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P R O C E E D I N G S

9:30 a.m.

MR. WILLIAMS: I'm Ray Williams, the Acting Regional Director of FEMA Region 9. And we're glad to sponsor this meeting of the Western Territory, which is FEMA Regions 8, 9 and 10. That's Denver, Seattle and San Francisco. It's basically the west coast.

In particular I am glad to be the one to welcome you here to this western meeting because in addition to being Acting Regional Director of FEMA Region 9, I'm also the Deputy Regional Director of FEMA Region 10. So I have roots in both regions, two out of the three.

FEMA received its mission for off-site nuclear preparedness for commercial nuclear power plants in 1979, as a direct consequence of the Three Mile Island incident. It was the first mission, first major mission that was added to our agency. We had been created by President Carter that same year.

Now the President's action in giving us responsibility was a direct result of his seeing that the protection of public health and safety around a nuclear power plant is a most serious business.

This public meeting that I'm welcoming you to here this morning is a clear indication that we continue to

take our off-site preparedness responsibilities very seriously.

The Strategic Review Steering Committee has worked for over a year to examine various aspects of our radiological emergency preparedness program. We call that REP. It's too big to say in one phrase. To look at new ways to better implement that REP program.

We're making a huge effort to take a look at our current REP program to see if there's a way we can do a better job to protect the health and safety of the public. This is consistent with the President's initiative when he first came into office to reinvent the government.

To insure that we have the best information the Committee is soliciting input from many sources. This meeting is another step in continuing that effort to be sure that they've heard from all parties that have information they'd like to impart, an opinion, before making any recommendations for change.

So I encourage you to take the opportunity to provide feedback to this Committee. That's the sole reason that they're here. They know that you've got important information to provide, so please take the time to provide it. It looks like we'll have plenty of time.

I feel confident that this is going to be a very

productive meeting, and I want to thank you in advance for helping us to restructure the REP program to further enhance FEMA's preparedness effort.

I'd like to introduce Anne Martin, who is the Deputy Director of our Exercises Division at FEMA Headquarters. And she is Chair of the Strategic Review Steering Committee. Anne.

MS. MARTIN: Thank you very much, Director Williams, for setting the stage for our meeting today. And, thank you, for joining with us today.

To begin the program we'd like to provide you an overview of the strategic review process, where we've been, how we got to where we are today, and where we're going, of course.

As Ray mentioned, the program -- FEMA's responsibilities with the program began in December of 1979 when FEMA took responsibility or the lead for off-site radiological emergency response planning. The mission at that time, and it has not changed, and it will not change, it's part of the strategic review, is the protection of the public health and assuring the public safety around commercial nuclear power plants.

Well, the program evolved and grew for the next 15 years, and roughly in February 1994 through September of

1996, the National Emergency Management Association, several of their subcommittees issued resolutions which they passed on to FEMA concerning the Radiological Emergency Preparedness Program.

In 1994 through 1997 as the National REP Conference met in their yearly meetings those attendees proposed changes, and they also were passed on to FEMA as an outgrowth of their meetings.

In May of 1995 the Nuclear Energy Institute prepared a white paper, which was given to FEMA, concerning suggested changes to the REP Program. And you may recall that in February of 1995 FEMA held what is popularly known as the Kansas City meeting. And that was the meeting to streamline exercise reporting and it resulted in the SERF, or the Standard Exercise Report Format, which is currently in use.

Other than the SERF report, there have been no major changes to REP program since it's beginning in 1979. So, in June of 1996, bearing in mind the resolutions that had come from NEMA, the NEI white paper, and also comments that had come in from the National REP Conference, as well as other state and local entities, FEMA Director, James Lee Witt directed that there would be the first comprehensive review of the REP program. Of course, this was 17 years

after the program had begun and many things had changed since 1979.

There were also a couple of items going on on the national stage that had a bearing on the FEMA REP review. That was the national performance review that was set in place by the current Administration, and also the Government Performance and Review Results Act, which was directed at the federal government, that the federal government take an in-depth look at programs such as REP that had been ongoing for a number of years, to look at performance criteria, to look at the results being attained from the energy put on those programs; and also outlined a model. And that's the model that we used as a steering committee in outlining the REP Strategic Review.

Now there were two other acts that influenced the strategic review, the evolvement of the way we would carry it out. One of those is the Federal Advisory Committee Act.

You may be familiar with that. That's an Act whose responsibility lies with the General Services Administration. And it governs the federal government interaction with nongovernmental entities.

To have the public participate in the REP Strategic Review it would have to be done through this Act, the Federal Advisory Committee Act. Federal advisory

committees are probably a two-year process to establish. The process is undertaken on those activities that are deemed to be of a long term or continuing process. And the REP Strategic Review has a sunset provision in it.

The other act that governed the strategic review is the Unfunded Mandates Reform Act. That's an Act that was signed by President Clinton in March of 1995 and it indicated that federal, state and tribal governments did have the responsibility and the federal government had the responsibility to move them early on, as early as possible prior to the issuance of any rule or any procedures that would impact them.

And it also directed that federal departments and agencies would consult with a wide variety of state, local and tribal government entities.

I mentioned earlier that the Government Performance and Results Act model was what we used in the strategic review of the REP program. And that model dictates that there be a needs assessment of the program that's being reviewed. That the objectives be revalidated; be very clearly stated; be revised, if necessary; that strategies be developed for the review; and that there be stakeholder involvement in the review.

Before you go on I wanted to mention a little

bit. The needs assessment, we actually went out to the public at large to assess the needs. That was through the Federal Register with an announcement.

The objectives, the objective has not changed since the initial mission in 1979. The objective was still to be protection of public health and safety.

And the strategies we developed for this review, I'll be talking to you about those with the next Vugraph.

And, of course, the stakeholders I mentioned, state, local, tribal. We had a meeting in September, the federal forum. And then we're here at the at-large stakeholders meeting. And I'll elaborate on that in just a couple of seconds.

Okay, Tom. Mentioned the strategies for the review. Typically we have done planning using the linear planning model. That is, as a federal entity, headquarters and regions, we issue a draft plan. We issue a draft document. Receive comments on that document, and then typically go into implementation.

For the REP Strategic Review we looked at another model to use, and that is what's called accordion planning.

Now, if you'll take note, the circles on this transparency indicate the Strategic Review Steering Committee, and each of those blocks indicate the stakeholders.

The first circle, Strategic Review Steering Committee, met, developed certain concepts, and I'll be speaking more to those in just a moment. And then we went on that first square, expanded out to our state, local and tribal government for stakeholder input.

Came back in, Strategic Review Steering Committee. Went back out, expanded back out to the federal forum, which was held in Dallas in November. And, again, the final, the public-at-large stakeholders. We're here at this meeting today, and then we'll be meeting in the midwest and on the east coast later in the week.

Based on the input from all of these meetings, and as they impact on the concept papers that will be presented to you very shortly, the steering committee will be developing a draft document. Then that document, the input again will be expanded out to the public at large. Those draft concepts will be published in the Federal Register. It will be published on the FEMA website. And it's after receiving those comments that the steering committee would formulate additional recommendations. And only after that we would go into implementation.

To give you a little bit more background, in July of 96 the Strategic Review was announced in the Federal Register. This was a Federal Register announcement that

went out just, no holds barred; 120-day comment period. And we said to the public, give us your comments on the REP program, anything that you feel that needs to be changed. There were no parameters to these comments other than the primary objective, which is maintaining the public health and safety.

A 120-day comment period, as I mentioned. During that 120 days we had 60 respondents who came in with 178 specific comments. You can see here the major topic areas.

Exercises was a major topic area. General rep policy and guidance. And then a few comments on rep plans.

I haven't mentioned the Strategic Review Steering Committee. This is a list of the steering committee. They are all here with you today. And you'll have an opportunity to, if you haven't met them already, you'll be hearing from them as they comment on the concept papers.

The steering committee, what I'd like to point out to you is that the steering committee was put together with some thought as part of the strategy for attaining a true strategic review of the REP program.

We have NRC, the Nuclear Regulatory Commission, on the committee; both the Emergency Preparedness and the Response sides of NRC. We have PTE, the Preparedness Training and Exercise management of FEMA from our regional

offices, on the committee.

The RAC, the Regional Advisory Chair. We have representation from those individuals on the committee. As well as from the headquarters level, we have REP policy and REP training represented.

So the steering committee was established to bring together all of the experiences across the agency that had a stake in the REP program.

I mentioned the Federal Register notice, the 120-day comment period, all of the comments that came in. The steering committee took those comments from the Federal Register, as well as the resolutions that were passed by NEMA, as well as the comments or papers that had come in from the National REP Conference, and the Nuclear Energy Institute white paper, as well as various comments that came in from FEMA staff who had worked on the program, both in the past and currently.

And from all of those comments there seemed to be four principal concepts that emerged. And the committee crafted those into these four concept papers that you see before you. And these will be presented shortly.

Comments seem to fall into -- delegate into what might be termed a delegated state, exercise, streamlining, partnership and the REP program and the radiological aspects

of REP.

I also would stress, and I think our presenters later will stress to you that these are concepts. As part of this kind of strategic review, concepts are put together and then we take them out to the stakeholders to really get a true assessment of what needs to stay and what perhaps needs to be revised with the concepts. Or just what the stakeholder assessment is.

So, where do we go from here? The plan is that in January the Strategic Review will commence deliberation on the comments that we'll be receiving today, the comments that we'll receive at the midwest meetings, as well as at the east coast meeting. The comments that we received at the federal, state and tribal meeting, as well as the federal forum.

Then in January of this year, January of 97, the Strategic Review Steering Committee commenced deliberation on all of these concepts that had come in via all of the papers, as well as the Federal Register.

Also in January another initiative was undertaken by FEMA and that was establishing a regional advisory committee, assistance committee, that is the chair of each of the RAC committees in the FEMA regions, coming together to talk about consistency across regions, or just having a

forum to discuss the various activities.

In July of 97 the RACAC reviewed the concept papers. As I mentioned in September the government stakeholders meeting actually reviewed the concept papers. The federal stakeholders reviewed the concept papers in Dallas. And then today and Thursday and Friday these same concept papers will be reviewed with each of you at these public meetings.

We anticipate in January of 98 having a FEMA stakeholders meeting, that is our FEMA staff. They have not had an opportunity to comment as of this point on the concept papers as they stand. And pending funding, we do plan to bring all of the FEMA staff together to comment on the concept papers.

What's in the future? In February of 98, roughly two months from now, we anticipate having proposed recommendations go to the FEMA Director. Then after that, those recommendations would go into the Federal Register for a comment period. And our plan is that by May of 98 there would be some draft recommendations that would go to the FEMA Director for later implementation by FEMA Headquarters in the FEMA regions.

That is an outline of the process that the Strategic Review Steering Committee used in looking at the

REP program. And as I mentioned we are still looking at it because we're looking at you to provide additional comments to assist us in that look.

So, without further comment I'd like to turn to the next part of the program which is actually a review of the concept papers. And to take us through that review it's my pleasure to introduce to you Mr. Rick Auman. He is from Human Technologies, and will be acting as the Facilitator for today's activities. Rick.

MR. AUMAN: Thanks, Anne.

I'd like to quickly run through some ground rules for this morning and this afternoon, and just talk about how this session will go, to give you some idea of how we intend to run the meeting here.

First of all, each of the concept papers will be presented. They will give you a quick overview of their concept papers. The panelists will come up and give a quick overview of the papers.

We would ask that you hold any questions you have until after they've finished their presentation. And then there will be time for any clarifying questions that you may have at that time.

We would ask that you, if you have clarifying questions, please move to one of the microphones. There's

several reasons for that. One, of course, we're in a large auditorium here. It will be easier for the panelists to hear, as well as your colleagues to hear your questions. And, finally, we do have a recorder who is taking down all our comments and will be transcribing them. It will be easier for him to hear your questions if you do have those.

There will be a staff person at each microphone to assist you if the microphone is not turned on, or if there are any problems. And they'll indicate to you when it's your turn to ask that question. And the panelists will then respond.

If you have prepared responses and comments that you would like to make those will begin this afternoon at 2:00. We would ask, if you have comments to make at 2:00, if you would just line up at either of the two microphones.

And, of course, given the small numbers that shouldn't be a problem finding space for you.

We established a ground rule of five minutes per person, not knowing how many people would show up. We would ask that you stick with that at least to begin with here. Although, of course, there will be plenty of time if any of you want to come back and continue comments we will be happy to listen to those as long as we're here, which will be till 4:30 this afternoon.

We'll take comments from one microphone at a time, alternating back and forth. As long as people want to continue to stay and talk about the program, we'll stay up until our ending time, which will be at 4:25 we'll take our last comments, and we'll end at 4:30, if there's anything else that people would like to pass on. Okay?

Again, as you go up to the microphone there will be somebody at each microphone. They'll brief you on the ground rules from the microphone, ask you to give your name and your affiliation, those kinds of things, for the recorder. And then we'll tell you when it's your turn to offer your statements. Okay?

Are there any questions before we begin?

Okay, the first paper we'll present this morning is the partnership paper in the REP program. That will be presented by Sharon Stoffel, Mary Lynn Miller and Stan MacIntosh will be coming up, as well. Yeah.

MS. MILLER: Good morning. My name is Mary Lynn Miller. I'm from FEMA Region 4 in Atlanta, Georgia.

Anne pretty much gave you a good overview of basically how we approached this as a committee, in terms of the concept papers, themselves. And I think the one concept that really needs to be brought out is in terms of the actual feedback that we got from the Federal Register

comments and those from the other organizations, that this Committee's role was to assimilate those into concepts that could be looked at; but, basically it was not the role of the Committee to actually create these ideas. So, these are basically a compilation of things that came from the Federal Register.

And we selected the partnership paper as the initial paper for the presentation because it is probably the most over-arching of all of the concept papers. The concept theme really touches all of the papers, themselves.

And the basic issue involved in this concept paper is should the role traditionally assumed by FEMA be modified from principally that of evaluator, of state and local ability to implement emergency response plans, to one more defined as a partnership with a broader relationship with the constituents.

And towards that end I think you probably all have copies of the paper or have seen it. But basically it's divided into four topic areas. I will present the first two sections, those being performance and policy. And my colleague, Sharon Stoffel, will present the second two sections, which are technical assistance and federal exercise participation.

And I must point out as you hear these, the

portions of the concept paper presented, that each of these sections should be treated rather independently. In other words, one section could be adopted without the other sections. So it could be selected between the different components of the concept paper. And that could be done very successfully.

Obviously the partnership would be enhanced with the full adoption of all the concepts, but again, they are rather independent in their context. Stanley, the next one, please. Stanley MacIntosh from Region 2, from New York, has kindly assisted us in our flipping here.

Beginning first with the performance section, many commenters proposed that federal, state and local government entities all have the same goal of protecting health and safety to the public. And so therefore many of the comments received focused on providing more flexibility to state and local governments, and reducing federal oversight in general.

Many commenters relayed that these recommendations appeared to be particularly applicable to REP in the environment that we're in right now, in that first, over the years the REP program has existed, the program has developed a very defined definition of the capabilities that a state and local and tribal government

must possess in order to adequately protect the public.

And at the same time those same years produced a sense of maturity and experience level within those entities to be able to carry out those plans to protect the public. And that the established record of performance justified a higher degree of control over the actual execution of the program and the environment that we exist in now.

A number of commenters recommended consistency with the guiding principles for federal efficiency outlined in the national performance review or NPR. I'm sure you're probably all basically familiar with that.

NPR recommends the development of performance partnerships between the entities of federal sector and state and local and tribal governments. And the focus of the partnerships is really seen as twofold.

First, it does recommend increased flexibility on how to actually accomplish goals that are set out and agreed to nationally. Coupled secondly with an increased sense of accountability in how those are done. So kind of, could be seen as a trade-off, a flexibility and accountability.

And the implementing fashion in how to move towards that, Anne mentioned in her introductory remarks, the Government Performance and Results Act, or GPRA, which is the guiding document for federal strategic planning.

What you'll see here in kind of a complicated little slide is the GPRA structure is really a tiered system that is not, I'm sure not foreign to anyone who's been involved in strategic planning. Basically at the global level, strategic goal setting. Goals which complement the overall mission of the program. And then from there the development of results-focused objectives. And generally performance measures or some way to gauge whether or not you've gotten there, are added at that particular level.

And then based on those goals and objectives that would be again more global or nationally set, the state and local governments would develop unique outcomes to achieve those. So the way to actually implement that would be the flexibility portion of that.

Now, the process, itself, was suggested to best take place in terms of the goal-setting portion of it, the upper level, in stakeholder or consensus fashion, so there is input into those objectives as that moves forward.

The challenge here, of course, is logistics. And how to accomplish that with adequate stakeholder input and still keeping the process manageable.

Just to give you -- here at the bottom of the slide you'll see PPA, off to the left, and then other avenues. The structure which comprises FEMA's agreement

with state governments in a non-disaster environment are performance partnership agreements, or PPAs.

A number of commenters recommended that REP be included in the state's performance partnership agreement to better facilitate the integration of REP into overall emergency planning.

Now the paper, and I guess I need to point this out very strongly, the paper does not recommend the shifting of funding through the performance partnership agreement. The paper recommends that the funding agreement that currently exists with utilities of state and local governments remain in place.

But PPAs are not directly tied to funding. They are strategic goal-setting documents. And so therefore have an emphasis on planning rather than actual resources. And actually the paper points out that the actual use of the PPA, itself, is not the critical path. But the strategic planning that underlies that as being the basic concept.

So the basic question here is, is a strategic planning approach valid for REP at this point. Or have the goals and objectives already been adequately established. So that would be the feedback we'd be looking for from you.

Next slide, Stanley. There's a little bit of a disconnect on letters here, so let me clarify that.

Originally there was a B section in this paper that was an evaluation component. That particular section, as we progressed in our assessment of the concept papers, appeared to heavily overlap the exercise streamlining. And we were finding that people were repeating their comments. And so rather than making people do that, we have moved that portion of this paper into the exercise streamlining paper.

So there's a B section that's evaluation that has been removed.

So, actually in moving forward into the policy development, it will read as C in your concept paper. But we have not left anything out, we just shifted it over.

So the second section of this paper is policy development, and focuses on the need for greater stakeholder involvement in the development of ongoing policy. The paper discusses a number of methods for that including the use of workshops and conferences, among others.

And the success, I think Anne mentioned the Kansas City conference, the success in the development of the standard exercise report format or SERF was referenced by a number of commenters as a positive model for stakeholder input.

And the comments we have received to date in doing, as Anne mentioned, we've gone through a number of

these various stakeholder input meetings. The comments we've received to date on that process have had a relatively high approval level on that increased stakeholder involvement.

The pros, of course, of continuing, and in fact increasing stakeholder input to policy development include increased ownership, improved consistency, and a broader access to technical expertise that is possessed throughout the country.

It should be recognized that it does require a more in-depth analysis of stakeholder positions to insure the adequate policy is adopted, and therefore this collaborative means is more time intensive, but certainly the results had been found to be more useful.

Okay, we'll go on ahead and proceed with Sharon's two sections, and then open it up for any clarifying questions you may have.

MS. STOFFEL: Good morning, I'm Sharon Stoffel, and I work for FEMA in the Boston Regional Office, Region 1.

I'll be talking with you about technical assistance suggestions that were recorded in the concept paper.

And for starters, I'd like to clarify the use of the term technical assistance. Some of you may think of it

in purely technical radiological terms, but the context of the commenters from the Federal Register was much broader. It would include programmatic and planning assistance, as well as radiological assistance.

Comments were provided suggesting FEMA shift its emphasis from prescriptive evaluation to technical assistance to the states, tribal nations and local government. This would be intended to improve the partnership, as Mary Lynn was describing earlier.

FEMA would move from the role of an evaluator to more of a facilitator/educator. And presumably improved customer service would result.

Some examples of technical assistance that are contained in the paper and were provided by the commenters included plan improvement. And that would have FEMA in a role of providing more assistance with emergency preparedness plans for states, local governments and tribal nations.

A second kind of assistance could include training assistance. Again, FEMA assisting state, local and tribal nations, and participating in their training efforts.

Courtesy evaluations are the third means of providing technical assistance. This does happen in some evaluation contexts throughout the country, where it's not a

graded evaluation but rather a courtesy evaluation information exchange during rehearsals for exercises. And it was suggested that we continue and expand those kinds of efforts.

A fourth kind of assistance would have to do with radiological monitoring. And it was suggested that FEMA work with other federal agencies to identify key radiological monitoring and assessment capabilities, determine where more effort is needed, and work with those entities to make the needed improvements.

A fifth area could include internet involvement, and more specifically, creating a website for technical assistance for the REP program.

Another means of providing technical assistance could be emphasizing corrective actions versus an ultimate grade. Emphasizing correcting the issues during exercise play or drill play with less concern for the ultimate result, which is primary part of the way we do business now.

It's felt very strongly that improved learning would happen, it would be a less threatening environment, and relationships would improve within the partnership.

Another means for providing technical assistance could be for FEMA to take a more active role with the emergency alert system.

A final means of assistance could include FEMA assisting with special needs data, and that would mean FEMA getting involved in obtaining the data and working with the privacy issues surrounding that particular type of data.

Other areas that are mentioned in the paper could include such things as technical assistance conferences, more site visits, and things of that nature. Much more hands-on.

The final category for the concept paper had to do with federal exercise participation. It was felt that if the federal government were a more active participant in exercises that people on all levels would have a better knowledge of federal plans and federal resources that would be available in the scenario that was being tested.

We could better test the relationship between the federal radiological emergency response plan and the federal response plan. And an issue that would need to be examined that was certainly raised in the paper has to do with the requirement for greater commitment of resources in order for the federal government to play a larger role in REP exercising.

And those are the major categories for the partnership paper. Thank you.

MR. AUMAN: We have time allotted now if anyone

has questions. If you'd like to move to one of the microphones we'll take those clarifying questions now.

(Pause.)

MR. AUMAN: If not, I'll thank Sharon and Mary Lynn.

MS. MILLER: Thank you.

MR. AUMAN: The next concept paper will be presented on the radiological aspects of REP. The presenters for this paper are Falk Kantor, Tom Essig, Bill McNutt and Marcus Wynche.

MR. KANTOR: Good morning, I'm Paul Kantor. I'm a member of the Strategic Review Steering Committee, and I'm with the Nuclear Regulatory Commission in our Headquarters Emergency Preparedness Group.

And my cohorts here, Bill McNutt of FEMA, and Tom Essig of the NRC. Please feel free to join in with any comments.

This paper here, as you see, is the focus on the radiological aspects of REP in relation to the all hazards aspects of REP. If you examine FEMA's mission statement, one of the goals is stated as to establish in concern with FEMA's partners a national emergency management system that is comprehensive, risk-based, and all hazards in approach.

So, FEMA, as an agency, has been moving in the

direction of all hazards emergency planning. And we received several comments from the public and other organizations stressing or stating that REP should also be included in the all hazards approach to emergency planning.

During the course of the review of the issue of inclusion of REP in the all hazards generic approach to EP, a related issue was identified by the steering committee and also in some of the comments concerning whether the efforts of state and local governments, as well as FEMA, should be focused on those activities in REP unique to radiological emergencies and less on the non-radiological aspects, the generic aspects common to all emergencies.

So from that we developed the issue, the concept paper issue of would the REP program be more effective and streamlined by focusing more on radiological activities and less on non-radiological activities. So that's the issue of this paper.

And in our review we first took a look at the planning standards and evaluation criteria of new reg 0654, the objectives and in demonstration criteria in REP 14 and REP 15, which could be considered specifically radiological or all hazards, generic.

We also examined the regulatory basis for EP to determine if there were any impediments to moving REP into

all hazards. And we took a very brief overview look at the extent of changes which might be required in FEMA regulations and REP program guidance if we did implement this sort of program.

Under the current program all EP standards must be met, and the resulting REP program must continue to provide reasonable assurance. And we would certainly need to maintain that no matter which direction we went with any of these concept papers. But how this would be accomplished may differ from what is already in place.

In looking at all hazards, we did examine some of the plans from various states that have moved in that direction. There's a different spectrum of approaches on how different states and localities have attempted to include REP in their all hazards approach to planning.

FEMA, itself, has issued a guide, state and local guide 101, a guidance for all hazards emergency planning, which provides some recommendations and directions for developing all hazards plans. And the -- referred to as emergency operations plan, which consists of a basic plan functional annexes of the core functions similar to all emergency response. and then hazard-specific appendices which would include nuclear power plant accidents.

Next slide. It became apparent to us that the

plan format was not really relative to the issue. There are many different ways to format a plan, but if that's all you accomplish was a reformatting of a plan, the from a strategic review not too much was gained.

And then regardless of the format response personnel must be knowledgeable and able to demonstrate the plan's effectiveness in exercises.

As part of our review we reviewed the 0654 planning standards in the context of radiological or generic functions. And we quickly determined that that did not lend itself very well to trying to differentiate between radiological and non-radiological aspects because the standards pretty much encompassed both aspects.

We determined it was more useful to look at the REP 14 exercise objectives, and within the objectives, to the demonstration criteria and points of reference under each of the objectives, as shown in REP 14 and 15.

We took, like I say, a first cut at developing which of the REP 14 objectives could be considered non-radiological and we came up with this short list of about four as an illustration, example. There aren't that many that really fall out as pure, non-radiological objectives.

A much larger category, you find that the objectives have both all hazards generic functions and REP

functions within them. And here's a list that we came up. Again, nothing magic or permanent about this list. Just an illustrative example of some of the objectives. If you're in the program you're very well familiar with them. That includes both aspects of RAD versus nonRAD.

And then we also identified another list of objectives that clearly appear to be radiological in approach. And this is a list of these objectives here. And you can see the majority of the objectives, or at least about 50 percent, have pure radiological aspects to them.

State and local governments, you know, have been demonstrating the ability to meet these objectives. And the question arises, is it practical to separate the objectives, the demonstration criteria, points of review that are considered radiological from the non-radiological. And if so, which ones. So that's the first question that arises.

And, for example, you can look at the objective of communications. It appears to be a generic activity. Every response, every emergency involves communications. But if you look at it closer some of the demonstration criteria do appear to have specific radiological functions.

For example, communications between plant operators and the EOC. From the EOC to field teams. That sort of thing are quite clearly radiological type

communication activities. And then the question is can these functions be separated without affecting execution of the exercise.

Another example we looked at was staffing. Objective 30, as far as a continuous 24-hour staffing. Again, that appears to be a generic preparedness response function, one that's maybe demonstrated in other non-radiological emergencies. But if you look close you find an aspect to it where the outgoing staff is expected to brief the oncoming staff as to the radiological aspects of the emergency. So, again, the question is can this function be separated without affecting execution of the exercise.

And we talk about the exercise, the concept of the integrated exercise. It's defined in the NRC and FEMA regulations. But the integrated exercise is just that, it does require involvement, participation of the major organizations that are part of the emergency response organization, as identified in the plans.

Includes the testing of the major observable portions of the on-site and off-site emergency plans, and mobilization of state and local licensing personnel and other resources in sufficient numbers to verify the capability to respond to the accident scenario.

And also, of course, the regulations require a

periodic exercise which is now biennial, to be conducted.

And in order to conduct a truly integrated exercise you really do need to include some of these generic activities, such as communications and so forth. And these generic, all hazard concepts really form the glue, you might say, for an exercise. So it's difficult to separate out the radiological versus non-radiological aspects from a truly fully integrated exercise.

Notwithstanding that we took a look at a possible alternative approach, and we show a schematic here of a possible approach to reaching a finding of reasonable assurance somewhat different than we do it today.

And there are a couple discrete -- a couple different areas that can be broken up. One is we call discrete drills; another one is a readiness appraisals, credit for exercises and expanded annual letter of certification. With, perhaps, a full participation exercise, which could be less frequent than it is now.

Let's take a closer look at each one of these and see what we're referring to. Discrete drills for radiological activities. There are some that immediately come to mind. Field monitoring team demonstrations. Emergency worker demonstrating capability of knowledge and using dose symmetry. Exposure control, DCON, use of KI.

Direction and control responsibilities. Showing understanding of technical information, radiological information. Protective action decision making. Medical response to a radiological emergency. And health physics drills are clearly radiological drills that could be done outside of the exercise in stand-alone, discrete fashion.

And you'll notice some overlap with this paper and a paper you'll be hearing about a little bit later on, the exercise streamlining paper.

Another part of this alternative approach is these, what we call readiness appraisals in conjunction with these drills. These are walk-throughs with response organization staff; perhaps an increase in inspections or examinations might be more appropriate to call them. Where FEMA staff would go out and interview and review capabilities of off-site organizations. Form inventory and roster reviews. Do audits of resources, and verify the current information listed in letters of agreement.

Another possible approach is looking, as part of this approach is looking at all hazard exercises; evaluating some of the aspects of all hazard exercises, apart from the REP exercise, or some of these activities that are non-radiological in function.

Another part of the approach is expanding credit

for real emergencies, or non-radiological response activities. Some of that is going on today, and that perhaps could be expanded.

And another part is assessment of the plans and preparedness in an expanded annual letter of certification.

So, with these different possible approaches it could lead to a way or approach to focus on the RAD aspects and less on the nonRAD aspects.

But that brings up certain issues to ponder here. And the first is can FEMA make its adequacy findings based on drills and other preparedness activities, combined with less frequent, full participation exercises. Under the present regulatory scheme, FEMA is required to evaluate and provide its findings to the NRC, it's findings of reasonable assurance that the plans are adequate and can be implemented.

Can you focus on the radiological aspects of REP without affecting the exercise process? And how and with what frequency does one make judgments on reasonable assurance?

Another question is would more focus on radiological functions and less focus on generic functions fragment a coordinated response process. And, finally, the bottom line overall question, does emphasis on the RAD

aspects of REP and less emphasis on the generic aspects of REP merit further consideration by the Committee.

Any additional comments, Bill, Tom?

MR. McNUTT: I'd just like to emphasize that the essence of this concept is the alternative approach, which proposes that we use these discrete radiological drills, the readiness assessments, the use of generic exercise activity and expanding credit for responding to real emergencies, and what we call the annual letter of certification where the state provides FEMA with a checklist of what they've accomplished during the year, per FEMA guidance.

And we take all these activities and combine them and do these on an annual basis. And then what have we gained? Well, if we take a look at the biennial exercise and we relax the frequency to perhaps once every three years, and once every four years, I think there is some advantages in reducing the intensity of evaluation that we currently have. Although the discrete drill would require an evaluator, certainly it wouldn't be to the extent that we currently have at our integrated exercises.

But what we need to, at some point, once every three or four years we would still need to have a full participation, integrated exercise.

MR. KANTOR: Any clarifying questions on the

concept, itself? We would entertain those now, or if you want, I guess, later to make statements. But if there's anything in the concept that we can clarify now we'd be glad to do that.

(Pause.)

MR. AUMAN: I guess not. Thank you.

I think -- we're a little ahead of schedule, I think we'll just go on with the next concept paper, which will be on Exercise Streamlining. And that will be presented by Bob Bissell, Janet Lamb and Woody Curtis.

MS. LAMB: Good morning, everyone. My name is Janet Lamb. I'm the RAC Chairperson from FEMA Region 3 in Philadelphia. And with me is Woody Curtis, the RAC Chairperson from Region 5 in Chicago. And Bob Bissell, the RAC Chair for Region 7 in Kansas City.

When we initially began reviewing all the comments received from you and others it was pretty evident that a lot of the comments centered around exercises and the exercise evaluation process. Our paper discusses this, but it also identifies several other areas and other methods to confirm the existence of reasonable assurance that the appropriate protective actions can be taken to protect the health and safety of the public within the area of the nuclear power plants.

Our purpose is to identify your comments into several different approaches that could be used in a combination to provide a reasonable assurance finding that health and safety will be protected.

The additional methods include concentration on results-oriented evaluations. Concentration on objectives that are radiological in nature. Expanded use of the annual letter of certification. And verification of the annual letters of certification through inspections or spot inspections throughout the year.

Development of a more flexible credit policy for participation in other natural hazard exercises, or in some cases in real events that the community has responded to. Bob will address these and other approaches that we have lumped together from all of your comments received in the Federal Register, the NEMA Conference, the white paper from NEI, and FEMA staff comments.

We've grouped them into eight areas and we would like to point out the fact that these could be used in a combination to provide the reasonable assurance that we need to do to maintain the program in the regulatory capacity.

In addition to the exercise streamlining paper, the RAC Chairpersons from across the country have developed a sample that is attached to the exercise streamlining, and

we would like to say that this is one approach that could be used to streamline the exercise evaluation tool used in the event of a full participation exercise.

Right now Bob is going to discuss each of the eight areas that we address in our paper as possible approaches to exercise streamlining.

MR. BISSELL: Thanks, Janet. As she said earlier, we've consolidated all these comments into eight different approaches. And some of these concepts, some of these ideas, some of these recommendations you've heard in previous papers, but what we've tried to do is apply these ideas and these concepts to the exercise process, itself.

I'd like to begin with the first approach which is the results-oriented exercise evaluation process. Currently the exercise evaluation methodology utilizes 33 objectives. This was introduced in September of 1991.

They contain a sizeable number of points of review that must be successfully demonstrated to meet the requirements of that objective. It's a very structured process and leaves very little latitude for the evaluator.

What has been proposed, which we have called the results-oriented evaluation process, is a significant change to that process. It does contain a reduced number of objectives. The objectives are much more broad, and the

checklist format no longer exists.

This process would allow the players to complete an activity without following a specific checklist. For example, if an emergency response decision was made in an emergency operation center to perform a certain response function, and that function did not necessarily follow the plan as far as resources or responsibilities or authority, and as long as that emergency response function was successfully completed, there would not be an exercise issue.

This would give the players much more latitude to reach a desired outcome. Evaluators would concentrate on the outcome of the exercise, and not the means to complete that task.

The second approach which you heard quite some detail earlier was to increase the focus on the radiological aspects of the REP program. The other non-radiological objectives could be accomplished by other means. And some of the recommendations provided to us were to do that, perform those functions in real events.

As you all know there are a lot of these objectives apply to any type of emergency such as fires, chemical spills, and other natural disasters. So those objectives could be demonstrated during those actual events,

and credit could be provided for those.

Another area that could be utilized to obtain credit for those non-radiological objectives would be in other nonREP exercises. This could be hazardous materials exercises, chemical stockpile emergency preparedness exercises, and other natural disaster exercises conducted through the state and local level.

The other recommendation was that some of these objectives, these non-radiological objectives, could receive credit or demonstrated through FEMA staff assistance visits.

And you've heard a little bit about that earlier, and we'll talk about that a little more in another slide.

The third approach was the consolidation of like objectives. We received quite a few comments that some of the objectives are very similar, and we could combine those objectives and actually reduce the number of objectives to be demonstrated.

Some of those would be combining, for example, objective 1, mobilization and objective 30, 24-hour staffing. Combining objective 2, facilities with objective 3, direction and control and communications. And combining objective 5, exposure control with objective 14, potassium iodide, just to mention a few.

This would eliminate redundancy in the points of

review between objectives.

Okay, the other approach was to update REP policy and guidance. FEMA has not done a very good job in updating the evaluation methodology guidance with the changes in the program. Most recently we've had some updates and changes to the emergency broadcast system and EPA has provided an update to their manual protective action guides.

The concern here was that FEMA should develop a method to quickly update these manuals and make it user friendly where these changes could be easily updated with page inserts.

Frequency of objective demonstration. There was a lot of concern here that we spend too much time on the emergency phase of these exercises, and that we should allow more time or flexibility for the state and locals to perform more ingestion and recovery and reentry objectives.

Some of the recommendations made to us was to, within that six-year cycle, allow the state the option to start off with an ingestion exercise and eliminate the emergency portion of that process.

One of the other comments made is that we have too much demonstration of some objectives, the overriding theme was that we should be evaluating medical drills on a two-year cycle instead of a one-year cycle.

There was some statements that we should have more frequent demonstration of some objectives. It was a consensus, I believe, that the state and locals would like to see more opportunities to demonstrate those ingestion and recovery and reentry objectives.

Then the other item that we've heard about earlier was to involve the federal players more. They would like to see the federal radiological emergency response plan tested in those ingestion exercises.

Okay, the other approach -- one of the other approaches was out-of-sequence demonstrations. Currently some state and local demonstrations are performed outside the exercise sequence. However, there appears to be an interest to expand on those demonstrations. Some of the suggestions we received were to include nursing homes, correctional centers, radiological laboratories, ingestion field teams, traffic and access control functions, dose calculations and others in these out-of-sequence demonstrations.

It was also suggested that the plume and ingestion exercises be done out of sequence. Specifically perform the plume or emergency phase exercise in one year, and possibly come back in the off-year and do the ingestion portion of that exercise.

Some of the other comments we received which we included in this approach was some concerns about the feedback provided by the evaluators. We had quite a few comments indicating that FEMA does not do a very good job with providing feedback to the evaluators -- or excuse me, to the players following the exercise. They would like to see more time spent immediately following the drill or the exercise with the players while they're still there and while everything is fresh on their minds to discuss the good things and the questionable things that occurred during the exercise. They feel that not enough time is spent on this process.

Another item, kind of innovative item suggested, was that FEMA be allowed to, at certain stages of the exercise, if it's observed that an evaluation is going poorly, that that evaluator stop that function and provide some on-the-spot training for that player, and then redemonstrate that objective right there while it's fresh on their mind.

The issue would be documented as an area requiring corrective action in the exercise report, but it would include an appropriate statement indicating that the issue was corrected and there would not be a requirement to perform that objective again during the next exercise.

The evaluators would provide immediate feedback to the exercise participants. And which they all felt, and we feel, too, would be positive feedback for the player. This would certainly result in a much more positive and meaningful experience with the player and the evaluator.

Another approach was exercise credit. And, again, we've heard a little bit about this in the previous papers. Currently FEMA only allows credit for two objectives, off hours and unannounced exercises and drills.

I think there has been some flexibility in some of the regions, though, with these two, with these items.

It's been proposed that that be greatly expanded to include numerous objectives such as mobilization facilities, direction and control, communications, schools, special populations, just to mention a few.

The suggestion was made that these objectives could be verified through either an actual emergency or other all hazard exercises. We've talked about that a little bit earlier before.

One of the concerns here, though, that was raised was that if this was to occur and we did decide to expand those objectives for credit, that FEMA-developed standard implementation guidelines that clearly documented the objectives that could qualify, and the required

documentation for those.

The last item, we kind of summarized all of these approaches into what we call the alternative evaluation approaches. And basically the commenters would like to see these items demonstrated in lieu of actually performing an evaluation.

Staff assistance visits. We discussed this a little bit earlier. It was discussed in more detail in another paper. FEMA would provide staff to perform visits to the state and locals to provide feedback on training, possibly some informal evaluations of out-of-sequence drills, or other exercises, non-evaluated exercises.

We talked about out-of-sequence evaluations again. They would like to see that greatly expanded to reduce the amount of time spent on full-scale exercises. Same with credit for actual events.

The annual letters of certification, it was proposed that that be expanded to include other items that are normally evaluated during exercises. Such things as -- equipment, maintenance and calibration; personal dose symmetry operability and maintenance; potassium iodide requirements; communication drills.

The last item, self-assessment. There are quite a few organizations, I believe on the east coast, that

participate that are below the county level and are required to demonstrate and participate in exercises. It's been proposed that those organizations below the county level perform self-assessments and provide the results of those assessments in the annual letter of certification.

That concludes our presentation and we'll entertain any questions for clarification.

Thank you.

MR. AUMAN: Okay, any questions?

All right, we're going to press on on the agenda then and finish up with our fourth concept paper on Delegated State. That will be presented by Steve Borth, Tammy Doherty and Rose Mary Hogan.

MS. DOHERTY: Good morning, I'm Tammy Doherty and I'm from the FEMA Regional Office in Seattle, Washington. And we have Steve Borth and Rose Mary Hogan. Steve is from FEMA at EMI; Rose Mary is from the NRC, in Headquarters, I guess.

As all the other presenters have said, these concept papers were developed using the comments from the Federal Register, and any other comments that we've gotten.

The delegated state concept, we tried to be a little creative. It's a fundamental change from the current rep program and it's somewhat far out, but we actually used

the comments that we got to put it together. So, it's definitely a different approach.

Under the concept FEMA would still provide reasonable assurance findings to NRC, however the method of collecting that information would be quite different than we do it now. If the concept is approved the implementation details would have to be worked out.

As the concept is written now, the delegation would be for each site. We would have 350 plan approval required before a site could become a delegated state or a delegated site. The group used the 350 plan approval, assuming that that would be sort of a baseline that reasonable assurance exists, and I guess there are 12 sites now that do not have the 350 plan approval. So, it could be a problem for those sites.

The states would submit a detailed annual letter of certification which would be the non-exercise vehicle that would document compliance. And it would be -- under the concept paper it would be an expanded annual letter of certification. And then FEMA would continue to provide limited oversight.

The program would be voluntary. The governor or his or her designee would apply. And then the state would have to meet certain criteria outlined by FEMA. Some of the

ideas that we had for that criteria would be that they would continue to -- that the states would continue to conduct and evaluate exercises. And that a standard expanded annual letter of certification that would contain some enhanced requirements would still need to be submitted each year.

The annual letter of certification would be very important and FEMA would rate, would take a look at the annual letter of certification and then rate each function.

And the ratings would be, as proposed in the paper, either acceptable, acceptable with recommendations for improvement, or unacceptable. And then based on those ratings FEMA would make an overall finding about reasonable assurance.

The findings could be described in three ways, either a reasonable assurance exists, reasonable assurance exists but the program needs improvement, or reasonable assurance doesn't exist. And if that happened then the state would have to develop some improvement strategies. And another possibility would be that FEMA would evaluate the next exercise. If the shortfalls weren't corrected then the site could lose the delegated state status.

The paper talks about really the major function that's being delegated would be the evaluation function, although the state would have control over all the other things, too, but the major function would be the evaluation

function. And as the concept paper is written, the state would use the FEMA-endorsed exercise methodology, and would still have to develop issues and corrective actions after exercises.

The state could use state and local staff as long as they were trained to evaluate exercises. And if the state wanted, then you know, you could still invite FEMA evaluators in, as long as they were available.

The last paper, actually I think a couple of papers have talked about the credit policy. Based on the comments that we've gotten it's pretty clear that we need a more enhanced credit policy and I think that that is definitely something that will come out of this process.

But one of the provisions in the delegated state concept could be the states could apply for the credit policy in their exercises, and then they could include that information in their annual letter of certification. And if FEMA identified any problems with it, then FEMA could go in and require some sort of correction. But the delegated states would be able to use the credit policy, also.

FEMA may opt to verify portions of the state's program periodically. Some of the areas we might want to look at would be the training plan for responders, drill or exercise evaluation plans, plan and procedure maintenance

program, the roster of key staff. And then periodic visits to assess facilities, equipment and training.

And part of the concept could be that states with good performance would have fewer verification visits. And then vice versa for states that don't have such great performance.

If this concept makes it through the process to the final recommendations, we would really need to look at the financial, how it would be funded. And that's not something that we've done because it was such a different concept that we didn't want to take a whole lot of time to do that now until we found out if it was really a viable concept.

So, some of the things we would need to look at is would the utilities continue to fund FEMA. Would some of that money be passed to the states. Would the utilities go ahead and just fund the states directly. And, you know, any other ideas that we can come up with. But the funding is definitely something we need to take a look at, and we have not.

Since this is such a fundamental change from the current program we would want to try it on a few pilot states before we just implemented it. And that way any problems that developed we would be able to work out before

it was fully implemented.

Sites without the delegated status would continue to be evaluated by FEMA, and would be able to take advantage of any of the improvements we made in the current rep program. But FEMA would still be as involved as they are now.

We tried to list some of the advantages and disadvantages. I'm sure we'll hear more disadvantages than we've got listed, but this is what we've come up with as far as advantages.

States would have much greater flexibility in conducting their REP programs. You would still have certain requirements, but the methods and procedures wouldn't be prescribed by FEMA.

The 350 plan approval process takes on more importance so that the 12 sites that currently don't have it may want to go ahead and get it. And it does provide a baseline for granting the delegated state status.

The annual letter of certification takes on more importance. It would be the primary document that FEMA would use to assess reasonable assurance, other than the exercise results.

And it's possible that some streamlining could result because it may reduce some of the FEMA resources that

are used now. As you've seen in some of the other papers we talk about having more technical assistance. So maybe some of the people now that are doing more evaluation type stuff could be used for some of the technical assistance.

Disadvantages. States would be evaluating themselves, and that could be perceived as not very effective. There could be -- the public might have a problem with that. You know, we're just not sure at this point.

This status would require more state resources. And if you couldn't make arrangements with other states, that could be a problem.

And FEMA would be involved in administering a dual system, because we'd have some states that had delegated status and others that did not. So we would still have to keep some group of FEMA staff to deal with the non-delegated states.

So that's kind of the concept in a nutshell. And if you've got any clarifying questions, I'd be glad to answer them.

MR. AUMAN: Any questions? Thank you.

We're going to adjust our schedule a little bit, given some comments that came up, and given that we're ahead of schedule based on the agenda that you have.

We're going to take a short break, about 15 minutes. Outside in the lobby there is a small snack bar there that does have coffee and sandwiches available.

We'll come back in about 15 minutes and I'll ask one member from each of our panelists to come up and we'll begin taking prepared comments.

I've got five of; we'll come back about ten after. So, at 11:10 we'll begin taking prepared comments and we'll continue on as long as we need to. And we'll make that decision if we have to break at that time.

Okay, so we'll take about 15 minutes and then we'll take your comments after that. Thank you.

(Brief recess.)

MR. AUMAN: We're still trying to track down our fourth panelist, but we're going to go ahead and start anyhow. We'll take comments at this time from anyone who would like to.

Again, we have plenty of time so I think the five-minute rule is really a moot point. So, if any of you would like to come down to the microphone we'll be happy to take your comments now.

Over here. If you would start off, please, with your name and your affiliation for our reporter, and then you can go from there. Thank you.

MR. WAAGE: Yes, my name is Edward Waage, last name W-a-a-g-e. I'm a Senior Emergency Planner with Diablo Canyon Power Plant, Pacific Gas and Electric Company.

We welcome the opportunity to comment on this review of the FEMA program. The REP program has matured considerably since its inception following the accident at TMI. Local and state governments have consistently demonstrated that they can and will protect the public in an accident.

There was a large body of detailed guidance memoranda, REP guidance, and evaluation methods which were developed largely in response to the results or to the needs of NRC licensing hearings. These detailed guidance may have been useful in the legal arena, but they are of limited value in evaluating the capability to respond to an accident.

We recommend that the detailed guidance, especially on exercise evaluation, be eliminated; and instead, use performance-based evaluation. Rather than asking did the responders follow every step of the procedure, we should ask were the decisions made and actions taken appropriate to protect the public.

Studies of successful responses by communities in emergencies which required evacuation indicated that there

are a few essential elements which led to that success. They are written plans for procedures, a regular exercise of those plans and procedures, and emergency response personnel who are trained in their duties.

The successful responses occurred in the absence of any federal oversight. I'm not suggesting that federal oversight be eliminated, but the nature of that oversight needs an extensive overhaul.

FEMA has added a layer of detailed criteria to evaluate local and state performance, which do little to improve overall preparedness. The detailed checklist in REP 14 and 15 should be replaced by broad objectives based upon the criteria of new reg 654.

And evaluation of those objectives should consist of a determination of whether the state and local governments made appropriate decisions, and whether the public was adequately informed of those decisions. The outcome of the response is the most important part.

The current process encourages evaluators to look at every step of the procedure, and if it's not followed step-by-step the evaluator writes up a finding. This process discourages management of the emergency, and instead rewards simple following of checklists. The real world requires that emergency responders exercise their judgment

to take the necessary actions. But such emergency management may be penalized by the evaluation process.

Another area of concern are the qualifications of FEMA evaluators. The exercise evaluation team is usually made up of large numbers of contractors from government laboratories. While they may be talented individuals, they rarely have an emergency preparedness background.

The best evaluators are those who have been there and done that. They are the local and state responders who have written plans and procedures, exercised those plans and procedures, and trained their agencies to carry them out.

We would encourage FEMA to use the talents and experiences that these local and state agency personnel could bring to the evaluation of exercises.

Further, the large numbers of evaluators are unnecessary. For example, the Nuclear Regulatory Commission does an admirable job in evaluating utilities response with a team usually consisting of four. And their evaluation is more performance-based than FEMA's.

If the emphasis is placed upon the outcome of the response, FEMA could perform its evaluation with a smaller, more effective evaluation team.

There is one area where the federal government can be of considerable help, and that is the direct

technical assistance. The Department of Energy has been making good progress in assisting states in recovery phases of an emergency. And FEMA should continue to put more resources into improving its own response efforts and those of other federal agencies. There are many opportunities in this area.

While my comments are fairly broad, I guess I do have specific concerns about some of the proposals. I guess the overriding one is the current situation where we have detailed criteria, lots of paperwork involved in determining effectiveness. I would caution that as you go forward and develop new criteria and so forth, objective-based, if you will, that the process not be cumbersome; that you look at the end user and the effectiveness of the program when you come up with your final documents, if you will. The devil's always in the details.

And when the final product is out, that it be easy to implement with as little burden as necessary for the local and state responders that can demonstrate that they are prepared.

Thank you. I can give you a copy of my prepared statement.

MR. AUMAN: Thank you.

MR. BROWN: Good morning, George Brown, San Luis

Obispo County Office of Emergency Services.

Listening to the concept papers brought out some ideas, and I'm going to tie my ideas to specific papers.

On the partnership concept paper, in talking about technical assistance, I think one thing that the FEMA regions could do would be to act as a broker, letting -- say one agency or one jurisdiction does a particularly good job of dealing with the special needs population list, let other people know who are struggling with that issue who's doing a good job of it.

And that would -- let's not reinvent the wheel. There are people out there with an emergency management community that have expertise. And if the regions really wanted to help provide it, FEMA's not the only source of the knowledge.

On the radiological focus concept paper, again I would emphasize the exercise credit for real world events. The functions of emergency management are not unique to REP.

Alert and notification and managing evaluations and traffic management, all of those things go on on a day-to-day basis in our jurisdictions.

And I think we could reduce the burden on FEMA in terms of the number of evaluators they bring into our communities, the paperwork burden, the financial burden, if

effective exercise credit was given for real world emergencies.

Along the same line there was talk about whether we should have all the objectives in the exercise or only the REP objectives. And I think maybe what we could do, again reducing the burden on FEMA, all the objectives could be included, but the only objectives that are evaluated would be the REP objectives.

I realize it's important to have the other objectives included for a smooth flowing exercise, but that doesn't mean that FEMA needs to be evaluating things that are done on a day-to-day basis.

And with regard to the delegated state concept paper, I would encourage FEMA to look at this very creatively. There are other examples out there in the federal government. The FED-OSHA/state-OSHA program is a classic example of a delegated program that's been very successful. States that had effective occupational safety programs prior to the concept of Fed-OSHA were permitted to continue those.

Another example is the federal/state forestry fire prevention programs where there's a tradeoff in jurisdiction, where the federal government will allow the states to provide the service where it's much more cost

effective.

Thank you.

MR. AUMAN: Thank you.

MS. HANDLEY: Good morning, my name is Pamela Handley; last name H-a-n-d-l-e-y. I work for Southern California Edison at the San Onofre Nuclear Generating Station. I'm the Supervisor of off-site emergency planning.

I have a few comments regarding the presentations this morning. First I'd like to mention that I appreciate the opportunity to participate as a stakeholder in this process.

Generally what we'd like to see is an emphasis and a focus on the exercise streamlining activity, place a priority on this activity, develop an action plan and a schedule for implementation.

We'd like to see a delay or deferral of the delegated state initiative until the higher priority strategic review activities have been implemented.

Comments on some of the concepts, monitoring of reasonable assurance. It has been established through a number of regulatory required licensing proceedings that the current level of exercise evaluation is sufficient to initially establish reasonable assurance program adequacy for any given site.

FEMA should continue to maintain the current level of evaluation for a site initial licensing exercise. Once this is conducted and an operating license is issued, the role for maintaining assurance of public health and safety should shift to one that monitors the adequacy of the program, rather than repeatedly reconfirming the initial finding during each subsequent exercise evaluation.

We believe the exercise evaluation process should be consolidated. The biennial exercises should be -- the evaluation of the biennial exercises should be limited to evaluating previously identified concerns.

We ask you to consider an efficient approach to the determining of reasonable assurance. And one of the things that's important to the utility is not using unrealistic exercise scenarios. Reducing the requirement for the medical drill frequency to a biennial requirement.

We recognize that we are indeed in partnership with the participants in the REP program, and one of the final things that we'd like to see is providing credit for real events. And using self evaluation.

The initiatives that you've discussed here today offer a window of opportunity for revolutionary change. We encourage you to accept the challenge and the leadership role and streamline the rep process and the program

operations.

Thank you.

MR. AUMAN: Thank you very much. Any other comments?

No? If not, I'll turn it back over to Anne Martin.

MS. MARTIN: Thank you, Rick. And I'd just like to thank each of our participants again for coming out today. And I also would like to take this opportunity to thank our Region 9 who just rendered us exemplary support and made this program happen today.

Sally Zrolkowski, probably most of you know Sally, who is the Preparedness Training and Exercises Division Director here in San Francisco. On her staff, Richard Echavarirra, and also today, Jeremiah Hall, David Fowler and Eliza Chan were supporting us with media inquiries. So, thank you to our Region 9 colleagues here.

And I'd like to remind you that if there are any comments that you have that come to mind after this meeting, after you have had an opportunity to cogitate what you heard about the concept papers, that you have an opportunity to submit written comments to the address -- this is also on your agenda, so you have a piece of paper to take away with the address -- to Nancy Goldstein on or before January 1st.

That is a date that was established because the Strategic Review Steering Committee will begin its deliberations in January to develop the preliminary recommendations. So any comments that come in before then, of course, would be folded into those initial recommendations.

And in particular I would like to thank Pamela Handley, Ed Waage and George Brown for your comments. And particularly for the challenge, to accept the challenge and to exercise the leadership role. That's certainly what we want to do here in redefining the REP program, but we can only do that with your help and your assistance, and in tandem with you.

So, again, we appreciate your coming out today and taking part in the process.

And that concludes our meeting.

(Whereupon, at 11:30 a.m., the meeting was concluded.)

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REPORTER'S CERTIFICATE

DOCKET NO.:

CASE TITLE: RADIOLOGICAL EMERGENCY PREPAREDNESS PROGRAM
STRATEGIC REVIEW

HEARING DATE: December 2, 1997

LOCATION: San Francisco, California

I hereby certify that the proceedings and evidence are contained fully and accurately on the tapes and notes reported by me at the hearing in the above case before the United States Federal Emergency Management Agency.

Date: December 2, 1997

George Palmer

Official Reporter

Heritage Reporting Corporation

1220 L Street, N. W.

Washington, D. C. 20005